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Attorney for David Nosal

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR-08-00237-MHP (JL)
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER PERMITTING MODIFICATION OF
Vs.)	PRETRIAL CONDITIONS OF RELEASE TO
)	PERMIT TRAVEL TO BRAZIL
DAVID NOSAL,)	
)	
Defendant.)	
)	
)	
)	

Defendant David Nosal, by and through their attorney, Steven F. Gruel, hereby requests that his conditions of pretrial release be modified to permit travel to Brazil from June 21, 2008 and return on June 25, 2008. This travel is business related.

On April 25, 2008, the Court authorized Mr. Nosal's pretrial release with the standard conditions including a \$50,000 unsecured bond, no travel restrictions within the United States and that Mr. Nosal's passport be surrendered to his counsel. Defense counsel informed the Court

STIPULATION AND [PROPOSED] ORDER PERMITTING MODIFICATION
OF PRETRIAL CONDITIONS OF RELEASE TO PERMIT TRAVEL TO BRAZIL

1 that Mr. Nosal's employment requires international travel. The Court ordered that any request
2 for international travel required notice to the government and the Court's authorization.

3 The government does not oppose and stipulates to this defense request. Further, Allen Lew,
4 Supervisor of Pretrial Services has been contacted and does not object to this defense request.
5 Mr. Lew has been provided with the address of and telephone number for the location where Mr.
6 Nosal will be staying while in Brazil. That location is the WTC Hotel, Av Nacoes Unidas,
7 12.559- Brooklin, Sao Paulo, Brazil [Phone: 11-3055-8000].

8 Upon his return to the United States, Mr. Nosal is to surrender his passport to his attorney
9 for safekeeping until further order of the Court.

10 SO STIPULATED:

11
12 DATED: 06/06/08

_____/s/_____
STEVEN F. GRUEL,
Attorney for David Nosal

14
15 DATED: 06/06/08

_____/s/_____
KYLE WALDINGER
Assistant United States Attorney

18
19 ~~PROPOSED~~ ORDER

20 PREDICATED on the above stipulation and GOOD CAUSE APPEARING,
21 defendant David Nosal's pretrial release conditions are modified to allow travel to Brazil as
22 stated in the above stipulation

23 Upon his return to the United States, Mr. Nosal is to surrender his passport to his attorney
24 for safekeeping until further order of the Court.

25 STIPULATION AND [PROPOSED] ORDER PERMITTING MODIFICATION
26 OF PRETRIAL CONDITIONS OF RELEASE TO PERMIT TRAVEL TO BRAZIL

1 All other conditions of Mr. Nosal's pretrial release shall remain in effect.

2 IT IS SO ORDERED.

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4 DATED: 6-6-08


HONORABLE JAMES LARSON
United States Magistrate Judge

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STIPULATION AND [PROPOSED] ORDER PERMITTING MODIFICATION
OF PRETRIAL CONDITIONS OF RELEASE TO PERMIT TRAVEL TO BRAZIL